UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
BROOKLYN

DAVID B. CAMPBELL,

Plaintiff,

-vs- Case No: 1:17-cv-3132

ARGENT MARINE OPERATIONS, INC.,

Defendant.
____/

O'BRYAN BAUN KARAMANIAN
DENNIS M. O'BRYAN
Attorney for Plaintiff
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____/

COMPLAINT

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this forum's boundaries.

2. Jurisdiction is founded under the Jones Act (46 USCA 30104) for negligence, and under the General Maritime Law for unseaworthiness, maintenance, cure, and wages.

3. At all times material to issues herein Plaintiff served as an employee of Defendant serving as a crew member aboard its vessels, with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment in the service of his ship.

4. On or about May 17, 2015, while a crewmember aboard the M/V Alliance Fairfax, Plaintiff did step through a water tight doorway onto a wet deck which was unreasonably slippery and lacking of non-skid when because of said failure to provide a safe place to work and seaworthy vessel he was injured with Defendant thereafter being derelict in its payment of maintenance and cure thereby aggravating the underlying condition.

5. Defendant's tortious acts aforesaid caused or contributed to Plaintiff's damages, **inter alia**, as follows:

a. Pain and suffering, past future;

b. Mortification, humiliation, fright shock and embarrassment;

c. Loss of earnings and earning capacity;

d. Hospital, pharmaceutical and other cure expenses;

e. Aggravation of prior condition, if any there be;

f. Inability to engage in social, recreational, and other pursuits previously enjoyed;

g. Mental anguish;

h. Found;

i. Maintenance, cure, wages and/or attorney fees.

WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan

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DATED: May 24, 2017

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DEMAND FOR TRIAL BY JURY

NOW COMES Plaintiff by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, and hereby demands trial by jury in the above-referenced cause of action.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan

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